

Jason Crews  
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*In propria persona*

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF ARIZONA  
PHOENIX DIVISION

Jason Crews,

Plaintiff,

v.

Tanpri Media & Arts, Inc, *et al.*

Defendants.

Case No.: 2:22-cv-02120-SMB

Memorandum in Support of *Plaintiff's Ex Parte*  
Application for Subpoenas Duces  
Tecum

Pursuant to Federal Rules of Civil Procedure (“FRCP”) Rule 45, 69, and General Order 18-19 (“Order”), Judgment Creditor Jason Crews (“Crews”) respectfully moves the court to instruct the Clerk of the court to issue subpoenas duces tecum to obtain evidence which he believes to be in the possession of third parties for the purposes of judgment enforcement against Judgment Debtors. In support thereof, Plaintiff states as follows.

On March 27, 2024, this court entered a default judgement in Crews’ favor. FRCP Rule 69 states “In aid of the judgment or execution, the judgment creditor or a successor in interest whose interest appears of record may obtain discovery from any person—including the judgment debtor—as provided in these rules or by the procedure of the state where the court is located.”

On May 6, 2024, the Court entered an Order (Doc. 38) granting Plaintiff’s prior Application (Doc. 37).

1 Plaintiff now realizes the entity he previously identified as Early Warning Systems,  
2 LLC, and to whom the prior subpoenas (Docs. 39-1 and 39-2) were issued, should have  
3 been Early Warning Services, LLC. All other aspects of Plaintiffs prior request remains the  
4 same.

5 **Early Warning Services, LLC**

6 Early Warning Services, LLC dba Zelle (“Zelle”) maintains an office at 5801 N Pima  
7 Rd, Scottsdale, AZ 85250, <https://maps.app.goo.gl/svuswrrFk65x2R1A7>, which is  
8 approximately 16.2 miles away from Crew’s address 1515 N Gilbert Rd, Gilbert AZ 85234  
9 and less than 100 miles complaint with rule 45(c)(2)(A).

10 Matthew Capozzoli

11 Per a user search on the Zelle payment processing system Capozzoli transacts  
12 business with Zelle. As such, Crews seeks the following from Zelle.

13 1. Please provide the Zelle Consumer Profile and Transaction Search for the  
14 following email address “customer token” associated email addresses:

15 • [mattcapozzoli@gmail.com](mailto:mattcapozzoli@gmail.com)

16 2. To the extent not duplicative of Request No. 1, please provide a list of all  
17 Zelle transactions associated with the tokens above from December 9, 2022 to  
18 present.

19 3. To the extent not duplicative of Request No. 1, please provide all bank  
20 account and customer information associated with the Zelle token account(s)  
21 identified, to include, but not limited to, the account holder name, address, SSN, and  
22 linked financial institution, bank account number, and routing number.

23 Elizabeth Beauvil

24 Per a user search on the Zelle payment processing system Elizabeth Beauvil transacts  
25 Zelle. As such, Crews seeks the following from Zelle.

26 1. Please provide the Zelle Consumer Profile and Transaction Search for the  
27 following email address “customer token” associated email addresses:

28 • [lizb65@gmail.com](mailto:lizb65@gmail.com)

2. To the extent not duplicative of Request No. 1, please provide a list of all  
Zelle transactions associated with the tokens above from December 9, 2022 to  
present.

Dated this May 10, 2024.

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Jason Crews